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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Amendment of Section 73.622(b),  
Table of Allotments, Digital  
Television Broadcast Stations  
(Thomasville, Georgia)

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MM Docket No. 00-98  
RM-9811

To: Chief, Video Services Division

COMMENTS OF CHANNEL 51, L.C.

Channel 51, L.C., permittee for new commercial full power television station WBIF(TV), analog Channel 51, Marianna, Florida ("WBIF(TV)"), by its counsel, and pursuant to Sections 1.415 and 1.420 of the Commission's rules, 47 C.F.R. §§ 1.415 and 1.420, respectfully submits these Comments in response to the Commission's NPRM in the above-captioned proceeding.<sup>1/</sup>

1. In the NPRM, the Commission sought comments on a petition for rule making submitted by WCTV Licensee Corporation, licensee of WCTV-TV, analog Channel 46, Thomasville, Georgia ("WCTV(TV)"), proposing that Channel 46 be substituted for Channel 52 as the digital television ("DTV") allotment at Thomasville, Georgia, as the second paired DTV channel for WCTV(TV).

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<sup>1/</sup> See Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Thomasville, Georgia), MM Docket No. 00-98 and RM-9811, Notice of Proposed Rule Making, DA 00-1216 (released June 5, 2000)(the "NPRM").

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List A B C D E

2. Channel 51, L.C. was granted a permit to construct WBIF(TV) on September 1, 1998, as the result of a universal settlement of mutually exclusive applications for the permit that were filed in 1996. See File No. BPCT-960404LN. WCTV(TV)'s current DTV Channel 52 allotment is on a first-adjacent channel to WBIF(TV)'s analog National Television Systems Committee ("NTSC") Channel 51 authorization, which may limit Channel 51, L.C.'s ability to modify WBIF(TV)'s facilities and serve Marianna. Therefore, Channel 51, L.C. has an interest in this proceeding.

3. Specifically, under Section 73.623(d)(2) of the Commission's rules, 47 C.F.R. § 73.623(d)(2), a 125 kilometer geographic separation is required between WBIF(TV)'s analog Channel 51 transmitter site and any first-adjacent DTV operation, such as the DTV Channel 52 allotment at Thomasville for WCTV(TV). Although the currently-authorized WBIF(TV) and WCTV(TV) transmitter sites<sup>2/</sup> are approximately 150 kilometers apart and therefore comply with Section 73.623(d)(2)'s 125 kilometer geographic spacing requirement, Channel 51, L.C. notes that both Thomasville and the WCTV(TV) transmitter site are less than the required 125 kilometers from the reference coordinates for Marianna,<sup>3/</sup> with separations of about 120 and 124 kilometers, respectively.

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<sup>2/</sup> WCTV(TV)'s currently-authorized DTV transmitter site is at 30° 40' 13" north latitude and 83° 56' 26" west longitude, and WBIF(TV)'s currently-authorized transmitter site is at 30° 30' 41" north latitude and 85° 29' 24" west longitude.

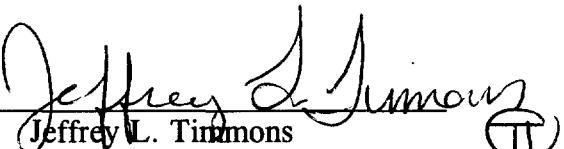
<sup>3/</sup> The reference coordinates for Thomasville are 30° 50' 11" north latitude and 83° 58' 44" west longitude, and for Marianna are 30° 46' 26" north latitude and 85° 13' 36" west longitude. See <http://www.fcc.gov/mmb/asd/bickel/atlas2.html>.

4. Since the WCTV(TV) transmitter site (and Thomasville) are both less than 125 kilometers from Marianna, the first-adjacent DTV Channel 52 allotment for WCTV(TV) would greatly limit potential alternate transmitter sites for WBIF(TV), if it became necessary or desirable for WBIF(TV) to modify its station. For example, any transmitter site for WBIF(TV) in Marianna itself, or on the Thomasville side of Marianna (i.e., to the east or northeast of Marianna), would be precluded by Section 73.623(d)(2). Therefore, Channel 51, L.C. submits that the public interest would be served by a grant of WCTV(TV)'s proposed substitution of Channel 46 for Channel 52 as the DTV allotment at Thomasville, Georgia as the second paired DTV channel for WCTV(TV), by eliminating this potential transmitter site restriction on WBIF(TV).

5. Wherefore, the above premises being considered, Channel 51, L.C. respectfully requests that WCTV(TV)'s petition for rule making be granted, and that Section 73.622(b), the Digital Television Table of Allotments, be amended to substitute DTV Channel 46 for Channel 52 at Thomasville, Georgia.

Respectfully submitted,

**CHANNEL 51, L.C.**

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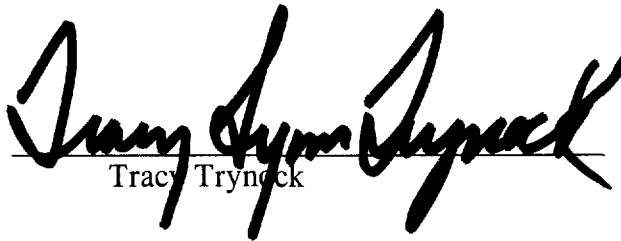
July 27, 2000

**CERTIFICATE OF SERVICE**

I, Tracy Trynock, hereby certify that on this 27th day of July, 2000, copies of the foregoing "Comments of Channel 51, L.C." have been served by hand delivery (\* denotes hand delivery) or first class mail, postage prepaid, upon the following:

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